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Attorneys for Plaintiffs,
KASSONDRA BAAS and KELLY LOFQUIST
individually and on behalf of all employees
similarly situated

**IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KASSONDRA BAAS and KELLY
LOFQUIST, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

DOLLAR TREE STORES, INC.,

Defendant.

CASE NO. C 07-03108 JSW

**DECLARATION OF DONALD S.
EDGAR, ESQ. IN SUPPORT OF MOTION
FOR CLASS CERTIFICATION**

Hearing Date: April 4, 2008

Time: 9:00 a.m.

Courtroom 2

Honorable Jeffrey S. White

I, DONALD S. EDGAR, hereby declare as follows:

1. The following declaration is based upon my own personal observation and knowledge, and if called upon to testify the things contained herein, I could competently so testify.

2. I am an attorney at law admitted to practice before all the State Courts of

1 California, and also admitted to practice before the District of Columbia; and the Northern,
 2 Eastern, Central and Southern Districts of California. I am a partner of the Edgar law firm,
 3 counsel of record for the Plaintiffs in the above-entitled action.

4 3. My background and qualifications are set forth hereinafter.

5 4. I received my Bachelors of Science from the University of California, San Diego
 6 in 1981. In 1988, I graduated from University of Southern California School of Law and was
 7 admitted to practice in the State of California in December of 1989. Since 1989, I have focussed
 8 my practice to the areas of complex litigation, including, but not limited to, federal multi-district
 9 litigation, state and federal class action, statewide coordinated proceedings, and multi-plaintiff
 10 and mass tort litigation.

11 5. I have been significantly involved representing parties in the following complex
 12 litigations: ***In Re: Diet Drugs***, case number JCCP 4032. Judge Daniel Solis Pratt of this Los
 13 Angeles County Superior Court; ***In Re: Diet Drugs***, MDL Docket No. 1203, U.S. District Court,
 14 Eastern District of Pennsylvania; ***In Re: Sulzer Hip Prosthesis and Knee Prosthesis***, MDL
 15 Docket No. 1401, Northern District of Ohio; ***In Re: Propulsid Product Litigation***, MDL – 1355,
 16 Eastern District of Louisiana; ***Whitright, et al. v. Santa Rosa Garden Apts.***, case number SCV -
 17 226809 Sonoma County Superior Court class action; ***Wieland, et al. v. Acarco, et al.***, case
 18 number CV80052, Mendocino County Superior Court class action; ***In Re: PPA Litigation***
 19 coordinated throughout California as ***JCCP 4116***, Los Angeles County Superior Court; ***In re:***
 20 ***Hunt, et al. V. Bayer, et al.***, MDL No. 1407, Western District of Washington; ***In re: Rezulin,***
 21 ***MDL No. 1348***, Southern District of New York; ***In re: Copley Pharmaceutical, Inc.***
 22 ***“Albuterol”, MDL No. 1013***; District of Wyoming; ***In re: Baycol, MDL No. 1431***; District of
 23 Minnesota; ***In re: L-Tryptophan, MDL No. 865***, District of South Carolina; ***In re: Guidant,***
 24 ***MDL No. 1708***, District of Minnesota; ***In re: Medtronic, Inc., MDL No. 1726***, District of
 25 Minnesota; ***In re: HRT Product Liability***, MDL No. 1507, Eastern District of Arkansas; ***In re:***
 26 ***Vioxx, MDL No. 1657***, Eastern District of Louisiana; ***In re: HRT Product Liability***, Philadelphia
 27 County Court of Common Pleas; ***Perez, et al. V. Safety Kleen, Case No. C-05-5338 PJH.***
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1 Honorable Phyllis J. Hamilton of this Northern District of California US District Court presides
2 over this case.

3 6. Most recently, within the last year, the Northern District of California has twice
4 certified my law firm as class counsel in two unrelated employment law class action cases. In
5 one case, *Sims et al. v. Metropolitan Life Insurance Company*, Case No. 05-02980 TEH, my
6 firm was approved as the sole legal counsel for a class of over 300 persons in a \$6.25 million
7 dollar class settlement. The settlement was reached after two years of active litigation against
8 Morgan Lewis, a premier employment law defense firm. In the other recent case, *Wamboldt v.*
9 *Safety-Kleen Systems*, Case No. 07-00884 PJH, my firm was among the firms approved by the
10 Court to represent the class. In that case, the certification of the class was over the hard fought
11 opposition of the defendant, who was represented by Seyfarth Shaw, another well-known
12 employment law defense firm. I personally took a lead role in the litigation of both cases.

13 7. No one from my law firm has ever been disciplined by the State Bar of California
14 for any matter whatsoever.

15 8. To date, our firm has spent many hours working on this case, including review of
16 hundreds of pages of documents produced by Dollar Tree, depositions of Plaintiffs and Dollar
17 Tree employees, legal research and preparation of legal briefing for the Court appointed
18 evaluator. Plaintiffs, Kassondra Baas and Kelly Lofquist, have consistently assisted us in the
19 preparation of this case, conducting record review, consulting with us as needed to explain
20 Dollar Tree company records, submitting themselves for deposition, and responding to written
21 discovery. Both have shown great respect for the import of this litigation and willingness to
22 stand up for the rights of all class members. Each has been completely cooperative in making
23 themselves available for deposition and discovery purposes, and for other litigation needs.

24
25 I declare under penalty of perjury under the laws of the state of California, and United States of
26 America that the above is true and correct and was executed in Santa Rosa on February 29, 2008.

27 

28 DONALD S. EDGAR, ESQ.